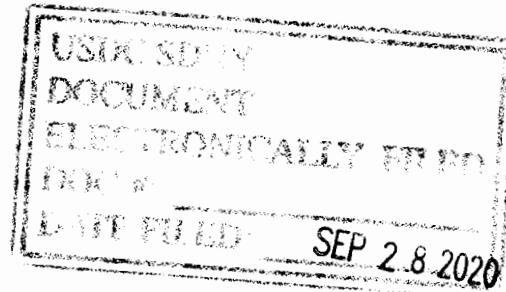


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK



LOCKHEED MARTIN CORPORATION,

Plaintiff,

Civil Action No. 15 CV 3636 (GBD)

v.

GLENCORE LTD.,

Defendant.

SO ORDERED:

George B. Daniels
George B. Daniels, U.S.D.J.

Dated: SEP 28 2020

STIPULATION OF PARTIAL DISMISSAL

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned parties, through their counsel, that all claims pending against Defendant Glencore Ltd. in the above-captioned litigation relating to (i) the case captioned *Commissioner of the Dep't of Planning and Natural Resources v. Century Alumina Co., et al.*, Civ. No. 2005-0062 (D.C.V.I., Division of St. Croix) (the “NRD Action”); (ii) the case captioned *Department of Planning and Natural Resources v. St. Croix Renaissance Group, L.L.L.P., et al.*, Civ. No. 2007-0114; (iii) the *Agreement And Consent Decree Regarding The Former Alumina Refinery Property, Anguilla Estate, St. Croix, U.S. Virgin Islands*, entered July 21, 2014 by the District Court of the Virgin Islands, Division of St. Croix; and/or (iv) all other costs associated with addressing environmental contamination from historic operations at the former alumina refinery located in St. Croix, U.S. Virgin Islands, are hereby voluntarily dismissed with prejudice.

IT IS HEREBY FURTHER STIPULATED AND AGREED that only the claims relating to the remediation of one or more petroleum plumes discovered near the property line

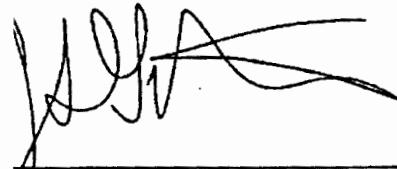
between the Alumina Refinery and the adjacent oil refinery (the "Petroleum Groundwater Contamination") remain pending in the above-captioned litigation.

IT IS HEREBY FURTHER STIPULATED AND AGREED that Lockheed Martin Corporation shall not amend its pleadings in the above-captioned litigation regarding the Petroleum Groundwater Contamination Costs, including to add parties or claim additional damages.

IT IS HEREBY FURTHER STIPULATED AND AGREED that the parties shall bear their own attorneys' fees, costs, and expenses.

Dated: New York, New York
September 24, 2020

BEVERIDGE & DIAMOND, P.C.



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Respectfully submitted,

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